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Attorneys for Defendant  
BRADLEY EARL REGER

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 2:23-cr-0177 TLN
	)	
Plaintiff,	)	STIPULATION REGARDING
	)	EXCLUDABLE TIME PERIODS UNDER
v.	)	SPEEDY TRIAL ACT; FINDINGS AND
	)	ORDER
BRADLEY EARL REGER,	)	
	)	
Defendant.	)	

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorneys CHRISTINA McCALL and ROGER YANG, and the Defendant, BRADLEY EARL REGER, by and through his counsel of record TASHA PARIS CHALFANT and KRESTA NORA DALY, hereby stipulate and request that the Court make the following findings and Order as follows:

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME

1           1.       By previous order, this matter was set for a status conference before Judge Troy L.  
2 Nunley on January 18, 2024, with time excluded to that date.

3           2.       By this stipulation, the defendant now moves to continue the status conference until  
4 May 23, 2024, and to exclude time between January 18, 2024, and May 23, 2024, under Local  
5 Code T4. Plaintiff does not oppose this request.

6           3.       The parties agree and stipulate, and request that the Court find the following:

7           a.       The government has represented that the discovery associated with this case will  
8 be voluminous and provided over periodic productions. To date, we have received approximately  
9 13,000 pages which includes investigative reports in electronic form, as well as audio/video and  
10 native files.  
11

12           b.       Counsel for the defendant desires additional time to review the voluminous  
13 discovery, develop the case, conduct investigation, consult with their client, discuss potential  
14 resolution, and to explain the consequences and guidelines.  
15

16           c.       Counsel for the defendant believes that failure to grant the above-requested  
17 continuance would deny them the reasonable time necessary for effective preparation, taking into  
18 account the exercise of due diligence.  
19

20           d.       The government does not object to the continuance.

21           e.       Based on the above-stated findings, the ends of justice served by continuing the  
22 case as requested outweigh the interest of the public and the defendant in a trial within the original  
23 date prescribed by the Speedy Trial Act.  
24

25           f.       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
26 et seq., within which trial must commence, the time period of January 18, 2024, to May 23, 2024,  
27

28                   STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
                    AND FOR EXCLUSION OF TIME

1 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
2 because it results from a continuance granted by the Court at defendant's request on the basis of  
3 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
4 of the public and the defendant in a speedy trial.

5 4. Nothing in this stipulation and order shall preclude a finding that other  
6 provisions of the Speedy Trial Act dictate that additional time periods are excludable from the  
7 period within which a trial must commence.  
8

9 All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on  
10 their behalf.

11 IT IS SO STIPULATED.

12  
13 Dated: January 9, 2024 by: /s/Tasha Chalfant for  
14 CHRISTINA McCALL  
15 Assistant U.S. Attorney  
Attorney for Plaintiff

16 Dated: January 9, 2024 by: /s/Tasha Chalfant for  
17 ROGER YANG  
18 Assistant U.S. Attorney  
Attorney for Plaintiff

19 Dated: January 9, 2024 by: /s/Tasha Chalfant  
20 TASHA CHALFANT  
21 Attorney for Defendant  
BRADLEY EARL REGER

22 Dated: January 9, 2024 by: /s/Tasha Chalfant for  
23 KRESTA NORA DALY  
24 Attorney for Defendant  
BRADLEY EARL REGER  
25  
26  
27

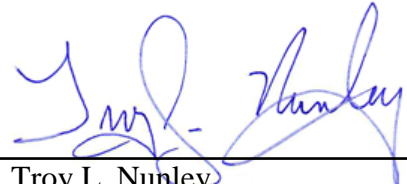
28 STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME

**ORDER**

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date of the parties' stipulation, January 18, 2024, to and including May 23, 2024, status conference hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Code T4 (reasonable time for defense counsel to prepare). It is further ordered that the presently set January 18, 2024, status conference shall be continued to May 23, 2024, at 9:30 a.m.

IT IS SO FOUND AND ORDERED this 9<sup>th</sup> day of January, 2024.

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Troy L. Nunley  
United States District Judge

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME